Hazard Communication Program
for
Eastern Plating Company, Inc.
1200 S. Baylis St.
Baltimore, MD 21224

Prepared by:
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Acting Technical Director
July 5, 2001

TABLE OF CONTENTS

HAZARD COMMUNICATION PROGRAM

EASTERN PLATING CO., INC.
REVISION: July 5, 2001

1 INTRODUCTION

1.1 Purpose:

The following written hazard communication program has been developed and implemented by:

EASTERN PLATING COMPANY, INC.
1200 S. BAYLIS ST.
BALTIMORE, MD 21224

to comply with the provisions of 29 CFR 1910.1200, and as required by the Maryland Access to Information about Hazardous and Toxic Substances Law, and COMAR 09.12.33

1.2 Scope:

This document describes the actions we have undertaken and policies we have implemented regarding compliance with the above referenced "Right-To-Know" regulations as they relate to our chemical information list, material safety data sheets, labels and employee information, employee training and notification of outside contractors.

1.3 Responsibility:

The Plant Chemist shall be responsible for the maintenance and revision of this document.

1.4 Location:

This program is available in the MSDS book in the Main Office and on file in the Main Office and the Lab.

2 CHEMICAL INFORMATION LIST

2.1 Statutory Requirements:

This section of Eastern Plating Co., Inc.'s Written Hazard Communication Program is intended to satisfy the requirements of Labor & Employment Article, Section 5-405, COMAR 09.12.33 and 29 CFR 1920.1200(e)(1)(I)

2.2 Origination

The Plant Chemist compiled the Chemical Information List.

2.3 Format & Content

In the Presentation of the Report Include the Company Business Address, Contact Person with Title, Telephone, Date of Preparation or Revision and in Tabular Form, List the Chemicals by the following information:

2.3.1 Common Name (Alphabetical Order): The name as it appears on label of the shipping container: drum, bucket, bag, can, bottles, etc.

2.3.2 Chemical Name - List all Hazardous Components

2.3.3 Work Areas - Plant-wide or Lab

2.3.4 Date Added to List

2.4 Availability

2.4.1 Location

The Chemical Information List is available in the MSDS book in the Main Office and on file in the Main Office and in the Lab.

2.4.2 Inspection

The Chemical Information List may be inspected by employees at any reasonable time during the course of normal business hours.

2.4.3 Copies

Copies of the Chemical Information List are available within eight working hours of the request to an employee's supervisor. An employee will be provided a copy or afforded the opportunity to make their own.

2.5 Indoctrination of New Employees

The existence, significance, and location of the Chemical Information List will be covered in the New Employee Orientation.

2.6 Maintenance, Upkeep, Revision, and Re-Submittal

2.6.1 Responsibility

The Chemical Information List will be maintained, updated and revised as specified herein by the Plant Chemist or that individual(s) to whom the responsibility of the duties of Plant Chemist fall.

2.6.2 Frequency

The Chemical Information list will be revised, re-alphabetized, and resubmitted to the Maryland Department of the Environment every two years. This list will be resubmitted on July 1, 2002 and on the bi-annual anniversary of that date in subsequent years.

2.6.3 Submittal

The completed list shall be forwarded to

Maryland Department of Environment
Technical and Regulatory Services Administration
Computer Modeling & Information Management Program
Community Right-To-Know Section
2500 Broening Highway
Baltimore, MD 21224

2.7 Introductions of Chemicals New to the Facility

2.7.1 Responsibility of Plant Chemist

2.7.1.1 Placement of Initial Order

Upon the placement of the initial order for the procurement of a chemical substances, the Plant Chemist must notify the Procuring Authority that said order is the first and that a Material Safety Data Sheet is to accompany the chemical at the time of delivery to Eastern Plating Co. Inc. All chemicals whether gratis or billed, must be requested through the Procuring Authority and must be ordered via a Purchase Order. The initiation, authorization and/or final approval of this process is the responsibility of the Plant Chemist.

2.7.1.2 Addition to The Chemical Information List

Upon receipt of a new chemical substance to the facility, the Plant Chemist will make the appropriate modifications to the Chemical Information List, incorporating that new substance on the list. This modification may be made as a handwritten entry to the Chemical Information List located in the MSDS

Book with duplicates being kept on file in the Main Office and Lab.

2.7.2 Responsibility of Procuring Authority
When informed by the Plant Chemist that an order for a chemical substance is an "initial order", the Procuring Authority shall specifically request in writing from the supplier or manufacturer that the Material Safety Data Sheet is to accompany the chemical at the time of delivery to Eastern Plating Co. Inc. This shall be noted on the Purchase Order.

2.7.3 Responsibility of Receiving Authority
The Receiving Authority shall realize that it has received a chemical new to the facility when it cross-checks and verifies receipt against a copy of the Purchase Order. At this point the Receiving Authority will confirm that a MSDS has been received with or prior to delivery of the chemical substance. If this is not the case, the Receiving Authority shall immediately request such document from the supplier or manufacturer. Receipt of this document should be via electronic facsimile (fax) machine if possible. The Plant Chemist shall be notified of the receipt of the chemicals once the Receiving Authority has completed their task.

2.8 Procedure for Incorporating into Chemical Information List

Upon receipt of a new chemical substance to the facility, the Plant Chemist will make the appropriate modifications to the Chemical Information List, incorporating that new substance on the list. This modification may be made as a handwritten entry to the Chemical Information List located in the MSDS Book with duplicates being kept on file in the Main Office and Lab.

2.9 Procedure for Notifying Affected Employees of the Introduction of New Chemical Substances.

Employees affected by the introduction of new chemical substances shall be verbally notified by the Plant Chemist of said fact and shall be also be notified by a posting on the Safety Bulletin Board. Such notices shall be displayed for a minimum of two weeks. The Plant Chemist shall also review the new chemical substance its purpose, area of use and storage, its properties and its hazards at the first plant-wide safety meeting convened following the introduction of the new chemical substance.

3. MATERIAL SAFETY DATA SHEETS (MSDS)

3.1 Statutory Requirements:

This section of Eastern Plating Co., Inc.'s Written Hazard Communication Program is intended to satisfy the requirements 29 CFR 1920.1200(g)

3.2 Origination

The Material Safety Data Sheets (MSDS) Notebook was initially compiled under the supervision of the Plant Chemist.

3.3 Availability

3.3.1 Location

The Material Safety Data Sheets (MSDS) are available in the MSDS Notebook in the Main Office and on file in the Main Office and in the Lab.

3.3.2 Inspection

Employees may inspect the Material Safety Data Sheets (MSDS) at any reasonable time during the course of normal business hours.

3.3.3 Copies

Copies of the Material Safety Data Sheets (MSDS) are available within eight working hours of the request to an employee's supervisor, the General Manager or the Plant Chemist. Requests shall be submitted in writing using the *"MSDS Request Form"* copies of which are maintained in the MSDS Binder. Management will grant the employee a copy of the MSDS or afford the employee the opportunity to make their own.

3.4 Indoctrination of New Employees

The New Employee Orientation will address the existence, significance, and location of the Material Safety Data Sheets (MSDS).

3.5 Maintenance, Upkeep, Revision, and Re-Submittal

3.5.1 Responsibility

The Material Safety Data Sheets (MSDS) will be maintained, updated and revised as specified herein by the Plant Chemist or that individual(s) to whom the responsibility of the duties of Plant Chemist fall.

3.5.2 Frequency

The Material Safety Data Sheets (MSDS) will be revised, re-alphabetized by common name, and resubmitted to the Maryland Department of the Environment every two years. This list will be resubmitted on July 1, 2002 and on the biannual anniversary of that date in subsequent years.

3.6 Introductions of Chemicals New to the Facility

3.6.1 Responsibility of Plant Chemist

3.6.1.1 Placement of Initial Order

Upon the placement of the "initial order" for the procurement of a chemical substances, the Plant Chemist must notify the Procuring Authority that said order is the first and that a Material Safety Data Sheet is to accompany or precede the chemical at the time of delivery to Eastern Plating Co. Inc. All chemicals whether gratis or billed, must be requested through the Procuring Authority and must be ordered via a Purchase Order. The initiation, authorization and/or final approval of this process is the responsibility of the Plant Chemist.

3.6.1.2 Addition to The Material Safety Data Sheets (MSDS)

Upon receipt of a new chemical substance to the facility, the Plant Chemist will make the appropriate modifications to the Material Safety Data Sheets (MSDS) Notebook, incorporating that new substance's Material Safety Data Sheets (MSDS) in the MSDS Notebook.

3.6.1.3 Responsibility of Procuring Authority

When informed by the Plant Chemist that an order for a chemical substance is an "initial order", the Procuring Authority shall specifically request in writing from the supplier or manufacturer that the Material Safety Data Sheet is to accompany or precede the chemical at the time of delivery to Eastern Plating Co. Inc. This shall be noted on the Purchase Order.

3.6.2 Responsibility of Receiving Authority

The Receiving Authority shall realize that it has received a chemical new to the facility when it cross-checks and verifies receipt against a copy of the Purchase Order. At this point the Receiving Authority will confirm that a MSDS has been received

with or prior to delivery of the chemical substance. If this is not the case, the Receiving Authority shall immediately request such document from the supplier or manufacturer. Receipt of this document should be via electronic facsimile (fax) machine if possible. The Plant Chemist shall be notified of the receipt of the chemicals once the Receiving Authority has completed their task.

3.6.3 Procedure for Incorporating Into Material Safety Data Sheets (MSDS) Notebook

Upon receipt of a new chemical substance to the facility, the Plant Chemist will make the appropriate modifications to the Material Safety Data Sheets (MSDS) Notebook, incorporating that new substance's Material Safety Data Sheets (MSDS) in the MSDS Notebook.

3.6.4 Procedure for Notifying Affected Employees of the Introduction of New Chemical Substances.

Employees affected by the introduction of new chemical substances shall be verbally notified by the Plant Chemist of said fact and shall be also be notified by a posting on the Safety Bulletin Board. Such notices shall be displayed for a minimum of two weeks. The Plant Chemist shall also review the new chemical substance its purpose, area of use and storage, its properties and its hazards at the first plant-wide safety meeting convened following the introduction of the new chemical substance.

4. LABELS

4.1 Statutory Requirements:

This section of Eastern Plating Co., Inc.'s Written Hazard Communication Program is intended to satisfy the requirements 29 CFR 1920.1200(f).

4.2 Incoming Containers

4.2.1 Responsibility

The Plant Chemist is responsible for ensuring that all incoming containers are properly labeled.

4.2.2 Requirements

4.2.2.1 All labels on incoming containers must contain:

4.2.2.1.1 The identity of the container contents

4.2.2.1.2 The manufacturers's name and address

4.2.2.1.3 Specific target organ hazard warning

4.2.2.2 All labels must be:

4.2.2.2.1 Legible

4.2.2.2.2 Written in English

4.2.2.2.3 Prominently displayed on each container

4.3 In-Plant Containers

4.3.1 Responsibility

The Plant Chemist is responsible for ensuring proper labeling of in-plant containers.

4.3.2 Requirements

4.3.2.1 Permanent Containers (Tanks):

4.3.2.1.1 All tanks shall be identified by Placards and/or Labels which shall collectively include the following information:

4.3.2.1.1.1 Common Name (Proprietary or Commodity); i.e. DW-560; Sulfuric Acid as it appears on the container from which it originated.

4.3.2.1.1.2 Concentration: i.e. DW-560 20% by volume; Chromic Acid 10 oz/gal

4.3.2.1.1.3 Operating Temperature Parameters

4.3.2.1.1.4 HIMG Rating for Health, Flammability, Reactivity, and Protective Equipment, if applicable, as it appears on the Container from which it Originated or as determined appropriate by the Plant Chemist.

4.3.2.1.1.5 *DOT* Hazard Warning: Appropriate Warning Label as it appears on the Container from which it Originated or as determined by the Plant Chemist. This would include:

4.3.2.1.1.5.1 Corrosive

4.3.2.1.1.5.2 Oxidizer

4.3.2.1.1.5.3 Flammable

4.3.3 Permanent Container (Tanks) Identification System The Plant Chemist will devise and maintain a system to provide the following:

4.3.3.1 Numeric Identification of Tanks

4.3.3.2 *Scaled, Graphic Representation* of Chemical Process Area Layout Depicting Process Tanks Identified by Common and Numeric Name.

4.3.3.3 Tabular Index of Tanks which contains the following information:

4.3.3.3.1 Tank Name

4.3.3.3.2 Tank Number

4.3.3.3.3 Tank Size in Gallons

4.3.3.3.4 Chemical Constituents

4.3.3.3.5 Constituent Manufacturer

4.3.3.3.6 Maximum Concentration of Constituents

4.3.3.3.7 Hazardous Components of Chemical Constituents

4.3.3.3.8 Hazardous Components of Chemical Constituents

4.3.3.3.9 Concentrations

4.3.3.3.10 Target Organ Hazard Warning for Chemical Constituents

4.3.3.3.11 HMIG Health Rating of Tank Contents

4.3.3.3.12 DOT Hazard Equivalents of Tank Contents

4.3.2.2 Portable Containers (Buckets, Carboys, Jars, Cans)

4.3.2.2.1 All portable containers which are used for direct transfer of chemicals from one vessel to another are not required to be labeled so long as that transfer is completed immediately without any unattended temporary in-transit storage of the material. If a container is used to store a chemical substance for any period of time in an unattended fashion, suitable labels are to be placed on the containers.

4.3.2.2.2 Labels shall include the following:

4.3.2.2.2.1 Common Name (Proprietary or Commodity); i.e. DW-560; Sulfuric Acid as it appears on the Container from which it Originated.

4.3.2.2.2.2 Concentration: i.e. DW-560 20% by volume; Chromic Acid 10 oz/gal

4.3.2.2.2.3 HIMG Rating for Health, Flammability, Reactivity, and Protective Equipment, if applicable, as it appears on the Container from which it Originated or as determined appropriate by the Plant Chemist.

4.3.2.2.2.4 DOT Hazard Warning: Appropriate Warning Label as it appears on the Container from which it Originated or as determined by the Plant Chemist. This would include:

4.3.2.2.4.1 Corrosive
4.3.2.2.4.2 Oxidizer
4.3.2.2.4.3 Flammable

5. OUTSIDE CONTRACTORS

5.1 Responsibility

The Plant Chemist, Shop Foreman or General Manager are responsibility to provide outside contractors with the appropriate information.

5.2 Notice to Contractors

Contractors shall be notified of the following items as they pertain to the risk of exposure that the contractor may receive within the scope of his assign work duties.

5.2.1 Hazardous chemicals to which they may be exposed while in the workplace and their location.
5.2.2 Measures to lessen the possibility of exposure.
5.2.3 Explanation of labels.
5.2.4 Location of MSDS's for hazardous chemicals.
5.2.5 Procedures to follow if they are exposed:
- 5.2.5.1 Appropriate Counter-Measures
- 5.2.5.2 Locations of Eye Washes and Safety Showers
- 5.2.5.3 Persons to Contact

6 EMPLOYEE INFORMATION AND TRAINING

6.1 Statutory Requirements:

This section of Eastern Plating Co., Inc.'s Written Hazard Communication Program is intended to satisfy the requirements 29 CFR 1920.1200(h)

6.2 Responsibility

The Plant Chemist is responsible for ensuring that all employees are trained in an adequate and timely manner.

6.3 Instructional Format

6.3.1 Orientation

All new hires will be orientated by the Shop Foreman as to the following:

6.3.1.1 Description of the Processes

6.3.1.2 Explanation Hazard Communication Standard and Right-to-Know

6.3.1.3 Location of Key Areas

- 6.3.1.3.1 Time Clock & Bulletin Board
- 6.3.1.3.2 Shipping & Rec.
- 6.3.1.3.3 Offices
- 6.3.1.3.4 Rest Rooms
- 6.3.1.3.5 Masking-Inspection Area
- 6.3.1.3.6 Racking Area
- 6.3.1.3.7 Process Area
- 6.3.1.3.8 Chemical Storage Area
- 6.3.1.3.9 Mechanical Room
- 6.3.1.3.10 Lab

6.3.1.4 Explanation of Hazards Associated with Normal Entry Level Tasks

All non-clerical, hourly employees are to be instructed as to the hazards associated with the job tasks specific to the Racking/Masking-Inspection Area. These hazards would include:

- 6.3.1.4.1 Penetration
- 6.3.1.4.2 Racks
- 6.3.1.4.3 Parts
- 6.3.1.4.4 Hand Tools

6.3.1.4.5 Chemical
6.3.1.4.5.1 Masking Products and Strippers
6.3.1.4.5.2 Entrapped Chemicals which could be released when blind holes are blown out with compressed air during the drying process.
6.3.1.4.5.3 Splashing from Process Chemical when in that area.
6.3.1.4.6 Impact
Flying Chips or Particles which could be released when blind
holes are blown out with compressed air during the drying process.
6.3.1.4.7 Lifting
Moving and Leveraging of Parts and Racks
6.3.1.5 Explanations of Job Classifications in which Hazards Exist
6.3.1.5.1 Racking Masking Inspection
6.3.1.5.2 Process Line Operation
6.3.1.5.3 Chemical Handling on Process Line
6.3.1.6 Proper Attire for Safety in the Workplace
6.3.1.6.1 No Open Shoes or Sandals
6.3.1.6.2 No Loose Fitting Clothes or Jewelry which would be prone to snagging or entanglement
6.3.1.6.3 No Dark Glasses that would impair vision
6.3.1.7 Personal Protective Equipment
6.3.1.7.1 Gloves: Cotton Gloves
6.3.1.7.2 Back Support: Support Belts will be provided to individuals required to lift objects of 75 lbs or more for men or 50 lbs or more for women.
6.3.1.7.3 Safety Glasses
Eye Protection Policy:
All employees are to be issued safety glasses to be worn in chemical process areas, parts dry-off area, the mechanical and chemical storage room and when using MEK in the masking area. Employees can exchange their glasses without charge if the old glasses are turned in.

6.3.1.8 Accidents
6.3.1.8.1 Report All Accidents to Supervisor
6.3.1.8.2 First Aid
6.3.1.8.2.1 Location Of First Aid Kit
6.3.1.8.2.2 Procedure for Self Administering
6.3.1.8.3 First Aid/First Response Coordinators
6.3.1.8.3.1 What Their Function Is
6.3.1.8.3.2 Who Fills Those Positions
6.3.1.8.3.3 How to Contact Them
6.3.1.8.4 Hospitalization
6.3.1.8.4.1 Situations Requiring Hospitalization
6.3.1.8.4.2 Procedure: Report to First Response Coordinators
6.3.1.9 Emergencies
6.3.1.9.1 Instruct on the Location and Contents of the Contingency Plan
6.3.1.9.2 Fires, Chemical Spills or Accidents, Explosions
6.3.1.9.2.1 Evacuate the Building: If an individual is not specifically trained to handle and emergency situation in which that individual is at risk of injury or an hindrance to others reacting to emergency.
6.3.1.9.2.2 Reassembly Area is on the Corner of Baylis and Toone Sts. by the Offices.

6.3.2 Post-Probationary Training
6.3.2.1 Purpose: To provide extensive training to employees who will be working in an environment where hazardous conditions may exist. This training will emphasize the Hazard Communication Standard, the employee's "Right-to-Know", and the Generation, Handling and Storing of Hazardous Waste.
6.3.2.2 Format: Classroom Instruction consisting of approximately four hours of proctored video lessons and text review with quizzes and follow-up discussion. The Plant Chemist shall be responsible for proctoring these training sessions.
6.3.2.3 Course Syllabus:
6.3.2.3.1 Hazard Communication Standard -- "Right to Know" (RTK)

6.3.2.3.1.1 The Right to Know Program and the employer and employee responsibilities
6.3.2.3.1.2 What classifies a substance as hazardous.
6.3.2.3.1.3 Recognition of hazardous materials and how to obtain information on them.
6.3.2.3.1.4 Basic ways to protect oneself from harmful exposure to hazardous materials
6.3.2.3.2 Hazardous Waste - "RCRA"
6.3.2.3.2.1 What is hazardous waste?
6.3.2.3.2.2 Storage and handling of hazardous waste.
6.3.2.4 Training Materials:
6.3.2.4.1 Audio-Visual
6.3.2.4.1.1 "Safety in Metal Finishing", AmericanElectroplating and Surface Finishing Association, Orlando, FL A video which covers the topic of the various hazardous conditions specific to the Metal Finishing Industry.
6.3.2.4.1.2 "Hazardous Materials and Hazardous Waste Management"; On-Site Environmental Services, Inc., Maple Grove, MN
6.3.2.4.1.3 "Personal Protective Equipment", On-Site Environmental Services, Inc., Maple Grove, MN
6.3.2.4.2 Pamphlets, Booklets, Posters & Handouts
6.3.2.4.2.1 "Preparing, Understanding and Using Material Safety Data Sheets"
6.3.2.4.2.2 "Hazardous Material Identification Guide Explanation" Lab Safety Supply, Janesville, WI
6.3.3 Line Operator Training
6.3.3.1 Purpose: To provide extensive training to employees who will be working in an environment where

hazardous will exist on a regular basis. This training will emphasize Personal Protective Equipment and Hazards in the Metal Finishing Industry.

6.3.3.2 Format: Classroom Instruction consisting of approximately four hours of proctored video lessons and text review with quizzes and follow-up discussion. The Plant Chemist shall be responsible for proctoring these training sessions.

6.3.3.3 Course Syllabus:

6.3.3.3.1 Chemical Hazards as they relate specifically to the metal finishing industry.

6.3.3.3.1.1 Acids
Nitric Acid
Sulfuric Acid

6.3.3.3.1.2 Alkalines
Caustic Soda
Alkaline Etch
Waste Treatment

6.3.3.3.1.3 Hexavalent Chrome

6.3.3.3.1.4 Fluorides

6.3.3.3.1.5 Flammables

6.3.3.3.2 Personal Protective Equipment (PPE)

6.3.3.3.2.1 Workplace assessment to determine existing and potential hazards that require personal protective equipment.

6.3.3.3.2.2 Basic Hazard Categories

6.3.3.3.2.3 Types of PPE

6.3.3.3.2.4 Proper Choice, Fitting and Care of PPE

6.3.3.4 Training Materials:

6.3.3.4.1 Audio-Visual

6.3.3.4.1.1 "Safety in Metal Finishing", American Electroplating and Surface Finishing Association, Orlando, FL A video which covers the topic of the various hazardous conditions specific to the Metal Finishing Industry.

6.3.3.4.1.2 "Personal Protective Equipment", On-Site Environmental Services, Inc., Maple Grove, MN

6.3.3.4.2 Pamphlets, Booklets, Posters & Handouts

6.3.4 Safety Meetings and Continuing Education and Training

Safety Meetings will be conducted once per month at which time a short, "Mini", (<15 minute) training session will be conducted. As required, longer sessions will be held for the purpose of plant-wide safety training.

6.3.5 Demonstration of Proficiency All categories of instruction mentioned above, with the exception of Orientation or "Mini" training sessions will be completed by the administration of a quiz. All employees must have a grade of 70% or better. If not, then the quiz will be re-administered with a tutor present to coach successful completion. An employee who has attained a score of 100% on a quiz without tutoring, shall no longer be required to take that quiz after subsequent training sessions. All quizzes and records of attendance of training sessions shall be maintained with similar safety records by the Plant Chemist and in each employee's personnel file.

6.3.6 Retraining/Review All employees shall be retrained on the information contained herein at a minimum of biannually for Hazard Communications, Right-to-Know and Personal Protective Equipment and annually for Hazardous Waste training.

6.3.7 Documentation of Training
The Plant Chemist will be responsible for assuring that all training sessions are recorded and that that record is filed properly. All records shall contain the following information:

6.3.7.1 Names of persons trained
6.3.7.2 Date and length of training session
6.3.7.3 Who conducted the training
6.3.7.4 Type of training
6.3.7.5 Outline or lesson plan